

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Keyon D. Harper

Debtor

Chapter 13  
21-30549-KRH

3710 Colonnade Drive  
Colonial Heights, Va. 23834

Last four digits of Social Security No 6362

**NOTICE OF MOTION AND NOTICE OF  
HEARING**  
**Motion to Approve a Loan Modification.**

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).**

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before **21 days after notice**, you or your attorney must:

- ✓ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

**Clerk of Court  
United States Bankruptcy Court  
701 E. Broad Street, Room 4000  
Richmond, VA 23219**

Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[aorange@massielawfirm.com](mailto:aorange@massielawfirm.com)

In re: Keyon D. Harper

Case No. 21-30549-KRH

Debtor

Chapter 13

You must also mail a copy to:

Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219

- ✓ Attend a hearing on March 30<sup>th</sup> at 12:00 P.M. scheduled at Judge Huennekens Courtroom 5000 , 701. E. Broad Street, Richmond, VA 23219 .

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: February 25, 2022

By: /s/Joseph S. Massie, III  
Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[aorange@massielawfirm.com](mailto:aorange@massielawfirm.com)

### CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2022, I sent, electronically, or mailed a true and exact copy of the foregoing Notice of Motion to all necessary parties.

Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[aorange@massielawfirm.com](mailto:aorange@massielawfirm.com)

In re: Keyon D. Harper

Case No. 21-30549-KRH

Debtor

Chapter 13

Argent Credit Union  
Attn: Bankruptcy  
Po Box 72  
Chesterfield, VA 23832

Capital One  
Attn: Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130

Conns  
Attn: Bankruptcy  
2445 Technology Forest Blvd, Bldg 4, Ste

The Woodlands, TX 77381  
Continental Finance Co  
Attn: Bankruptcy  
Po Box 8099  
Newark, DE 19714

Continental Finance Company  
Attn: Bankruptcy  
Po Box 8099  
Newark, DE 19714

Credit One Bank  
Attn: Bankruptcy Department  
Po Box 98873  
Las Vegas, NV 89193

Fingerhut  
Attn: Bankruptcy  
6250 Ridgewood Road  
Saint Cloud, MN 56303

First Electronic Bank  
Attn: Bankruptcy  
Po Box 521271  
Salt Lake City, UT 84152

Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[aorange@massielawfirm.com](mailto:aorange@massielawfirm.com)

First Premier Bank  
Attn: Bankruptcy  
Po Box 5524  
Sioux Falls, SD 57117

Fortiva  
Attn: Bankruptcy  
Po Box 105555  
Atlanta, GA 30348

Genesis FS Card  
Attn: Bankruptcy  
Po Box 4477  
Beaverton, OR 97076

Lendmark Financial Services  
1735 North Brown Road  
Suite 300  
Lawrenceville, GA 30043

Nations Direct Mortgag  
1 Corporate Dr  
Lake Zurich, IL 60047

Navy FCU  
Attn: Bankruptcy  
Po Box 3000  
Merrifield, VA 22119

OneMain Financial  
Attn: Bankruptcy  
Po Box 3251  
Evansville, IN 47731

Protas, Spivok & Collins, LLC  
4330 East West Highway  
Bethesda, MD 20814

Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[jsorange@massielawfirm.com](mailto:jsorange@massielawfirm.com)

In re: Keyon D. Harper

Case No. 21-30549-KRH

Debtor

Chapter 13

Synco/walmart  
Synchrony Car Care  
Attn: Bankruptcy  
Po Box 965064  
Orlando, FL 32896

Synchrony Bank/Care Credit  
Attn: Bankruptcy Dept  
Po Box 965064  
Orlando, FL 32896

Synchrony Bank/Lowes  
Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896

Synchrony Bank/TJX  
Attn: Bankruptcy Dept  
Po Box 965064  
Orlando, FL 32896

Total Visa/The Bank of Missouri  
Attn: Bankruptcy  
Po Box 85710  
Sioux Falls, SD 57118

Trac/CBCD/Citicorp  
Citicorp Credit/Centralized Bankruptcy  
Po Box 6497  
Sioux Falls, SD 57117

Virginia Credit Union  
Attn: Bankruptcy  
Po Box 90010  
Richmond, VA

February 25, 2022

RESPECTFULLY SUBMITTED  
Keyon D. Harper

By: /s/Joseph S. Massie, III

Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[aorange@massielawfirm.com](mailto:aorange@massielawfirm.com)

Virginia Credit Union  
Attn: Bankruptcy  
Po Box 90010  
Richmond, VA 23225

Woodforest National Bank  
Attn: Bankruptcy  
Po Box 7889  
The Woodlands, TX 77387

Joseph S. Massie, III

115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[aorange@massielawfirm.com](mailto:aorange@massielawfirm.com)

Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[aorange@massielawfirm.com](mailto:aorange@massielawfirm.com)

In re: Keyon D. Harper

Case No. 21-30549-KRH

Debtor

Chapter 13

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Keyon D. Harper

Case No. 21-30549-KRH

Debtor

Chapter 13

**MOTION TO APPROVE A LOAN MODIFICATION**

COMES NOW, Keyon D. Harper ("the Debtor"), by counsel and moves this Court to Approve a Loan Modification. As reasons therefore, the Debtors state the following:

1. Debtor filed their petition under Chapter 13 of the United States Bankruptcy Code, February 22, 2021 and has at all times since continued in possession of his property.
2. The Debtor's plan has been confirmed..
3. The Debtors' real estate which is the subject of this Motion is briefly described as 3710 Colonnade Drive, South Chesterfield, Va. 23834. The legal description is as follows:

**LEGAL DESCRIPTION**

ALL THAT CERTAIN LOT, PIECE OR PARCEL OF  
LAND, LYING AND BEING IN CHESTERFIELD  
COUNTY, VIRGINIA, KNOWN AND DESIGNATED AS  
LOT 24, BLOCK B, SECTION A, COLONIAL PINE  
ESTATES, ON PLAT OF SURVEY RECORDED  
JANUARY 4, 1978, IN THE CLERK'S OFFICE OF THE  
CIRCUIT COURT OF CHESTERFIELD COUNTY,  
VIRGINIA, IN PLAT BOOK 30, PAGES 28, 29, 30,

Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[aorange@massielawfirm.com](mailto:aorange@massielawfirm.com)

In re: Keyon D. Harper

Case No. 21-30549-KRH

Debtor

Chapter 13

REFERENCE TO WHICH PLAT IS HEREBY MADE FOR  
A MORE PARTICULAR DESCRIPTION.

PARCEL ID:

BACK DEED

GRANTOR: DENNIS D. PARMENTER

GRANTEE: DENNIS D. PARMENTER AND DIANE R.

PARMENTER, HUSBAND AND WIFE, AS TENANTS BY THE  
ENTIRETIES

WITH THE

RIGHT OF SURVIVORSHIP AS AT COMMON LAW

BOOK/PAGE: 6403/288

DATED: 05/12/2005 RECORDED: 05/25/2005 VESTING: YES

CONSIDERATION AMOUNT: 1.00

BEING THE SAME PROPERTY AS TRANSFERRED BY  
WARRANTY DEED ON 08/06/2014 AND RECORDED  
08/19/2014 FROM DENNIS D. PARMENTER AND DIANE  
R. PARMENTER, HUSBAND AND WIFE TO KATHRYN -  
JANE M. SANDOVAL AND RICHARD E. SANDOVAL,  
RECORDED IN BOOK 10627 AND PAGE 52

**Pursuant to Rule 6004-4, please be advised of the following:**

1. The original principal amount of the loan before modification is **\$184,594.00**
2. The principal amount of the loan immediately after modification is **\$168,630.32**
3. The interest rate applicable before modification remains the same.
4. The monthly mortgage payment is \$1404.74.
5. The new monthly mortgage payment is \$1,160.69.
6. The Debtor is entering into a Subordinate Deed of Trust for \$7178.92
7. The Subordinate Deed of Trust is due 04/01/2047 if not paid earlier.
8. The interest rate applicable to the loan immediately after modification is **3.75%**.
9. The maturity date of the loan before modification **04/01/2047..**
10. The maturity date of the loan after modification is 03/01/2052.

Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[aorange@massielawfirm.com](mailto:aorange@massielawfirm.com)



4. The Debtor request that the Court enter an Order granting their Motion to approve their Loan Modification and to grant them such other and further relief in this matter as appropriate.

WHEREFORE, Debtors pray that the Motion to Approve a Loan Modification be granted.

February 25, 2022

RESPECTFULLY SUBMITTED  
Keyon D. Harper

By: /s/Joseph S. Massie, III  
Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[jmassie@massielawfirm.com](mailto:jmassie@massielawfirm.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2022, I sent, electronically, or mailed a true and exact copy of the foregoing **Motion to Approve a Loan Modification** to all necessary parties.

February 25, 2022

RESPECTFULLY SUBMITTED  
Keyon D. Harper

By: /s/Joseph S. Massie, III  
Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)

Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[aorange@massielawfirm.com](mailto:aorange@massielawfirm.com)

[aorange@massielawfirm.com](mailto:aorange@massielawfirm.com)

Joseph S. Massie, III  
Attorney for the Debtor  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219

Keyon D. Harper  
3710 Colonnade Drive  
Colonial Heights, Va. 23834

Carl M. Bates  
P.O. Box 1819  
Richmond, Va. 23218

Joseph S. Massie, III  
115 North 1<sup>st</sup> Street  
Suite 100  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[aorange@massielawfirm.com](mailto:aorange@massielawfirm.com)

In re: Keyon D. Harper

Case No. 21-30549-KRH

Debtor

Chapter 13